

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: Referral of Rustin Barrel Site                      DATE: 11-13-91  
          Zion Church, Hanover County, VA

FROM: Lorie A. Baker<sup>B</sup> Acting Chief  
          Site Assessment Section (3HW13)

TO: Gregg Crystall, Chief  
          Eastern Response Section (3HW31)

The purpose of this memo is to refer to your section the Rustin Barrel Site for determination on whether a removal is necessary. The site is located on State Route 629 near Zion Church in Hanover County, Virginia.

In September of 1989, the site was discovered by loggers clearing the property. They encountered approximately 200-300 drums. It appears that the drums contain paint-related compounds; test results from a few of the drums indicate aliphatic hydrocarbons, aliphatic acids and esters, cyclohexyl hydrocarbons, aromatic hydrocarbons, and phthalate esters.

A search by the Virginia State Police was unable to identify any responsible parties.

Attached is the only information I have on this site. The Virginia Department of Waste Management sent this material to me for entry into CERCLIS. Please review the attached material and let me know if you will be pursuing this site any further. If you decide that a removal is not necessary at this time, we will enter the site into CERCLIS and conduct a preliminary assessment some time in the future.

cc: Tom Modena (VA DWM)

AR100002



POTENTIAL HAZARDOUS WASTE SITE  
SITE IDENTIFICATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
VA

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

Rustin Barrel Site

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

Rt. 629

03 CITY

Zim Church

04 STATE

VA

05 ZIP CODE

06 COUNTY

Hanover

07 COUNTY  
CODE

055

08 CONG  
DIST

09 DIRECTIONS TO SITE (Starting from nearest major road)

State Route 629 near Zim Church

III. RESPONSIBLE PARTIES

01 OWNER (Name)

Mr. Rustin

02 STREET (Business, residential, rural)

Route 629

03 CITY

Zim Church

04 STATE

VA

05 ZIP CODE

06 TELEPHONE NUMBER

( )

07 OPERATOR (If different from owner)

08 STREET (Business, residential, rural)

09 CITY

10 STATE

11 ZIP CODE

12 TELEPHONE NUMBER

( )

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE

☐ B. FEDERAL

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER

☐ G. UNKNOWN

IV. HOW IDENTIFIED

State Police & Virginia Department of Emergency Services

01 DATE IDENTIFIED

9, 8, 89

MONTH DAY YEAR

02 IDENTIFIED BY (Check all that apply)

☐ A. CITIZEN COMPLAINT

☐ B. INDUSTRY

☒ C. STATE/LOCAL GOVERNMENT

☐ D. AERIAL RECONNAISSANCE

☐ E. RCRA INSPECTION

☐ F. SURFACE IMPOUNDMENT ASSESSMENT

☐ G. OTHER EPA IDENTIFICATION

☐ H. OTHER

V. SITE CHARACTERIZATION

01 TYPE OF SITE (Check all that apply)

☐ A. STORAGE

☐ B. TREATMENT

☐ C. DISPOSAL

☒ D. UNAUTHORIZED DUMPING

☐ E. OTHER

02 SUMMARY OF KNOWN PROBLEMS (Provide narrative description)

200-300 drums illegally dumped on private property

03 SUMMARY OF ALLEGED OR POTENTIAL PROBLEMS (Provide narrative description)

Test results of barrel contents: aliphatic hydrocarbons (C8-C17),  
aliphatic acids & esters, cyclohexyl hydrocarbons, aromatic  
hydrocarbons (C2-C4), phthalate ester

VI. INFORMATION AVAILABLE FROM

01 CONTACT

FD. MODENA See Attachment

02 OF (Agency/Department)

Virginia Dept of Waste Management

03 TELEPHONE NUMBER

1804-225-2854

04 PREPARED BY

T.D. MODENA

05 AGENCY

VA-DWM

06 ORGANIZATION

07 TELEPHONE NUMBER

1804-225-2854

08 DATE

10, 30, 91

MONTH DAY YEAR

AR100003



## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF WASTE MANAGEMENT

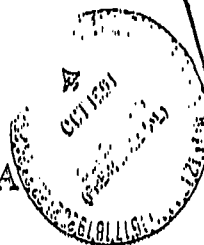
11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

TDD (804) 371-8737



### MEMORANDUM

TO: Thomas Modena, Water Resource Manager  
Superfund Pre-Remedial Program

THROUGH: W. F. Gilley, Director *WFG*  
Division of Regulation

FROM: James A. Saunders, Incident Investigations Chief  
Division of Regulation *JAS*

DATE: October 23, 1991

SUBJECT: Rustin Property on Rt. 629 in Hanover County

On September 8, 1989, we received a telephone call from Gregg Britt of the Department of Emergency Services. Mr. Britt was dispatched to the site on State Rt. 629 near Zion Church in Hanover County after loggers clearing the property encountered 200-300 drums.

Gregg took samples and had them sent to the Virginia Division of Consolidated Laboratories. He did some field tests. The pH of one drum was 6-7. Three or four drums were positive to the Drager Poly Test Tube and had readings of approximately 20% LEL were obtained with a combustible gas detector.

After consultation with the Department of Emergency Services, Manley Brown, Special Agent of the Virginia State Police, John Trivillian, Hazardous Materials Officer of Hanover County, and personnel of the Department of Waste Management met on the site.

After a reconnaissance samples were taken from several drums and sent to the Virginia Department of Consolidated Laboratories for analysis, the results were sent to the Virginia State Police.

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Memorandum to Thomas Modena  
Re: Rustin Property on Rt. 629 in Hanover County  
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Richard Fox, John Conover, and I returned with a contractor and equipment to manipulate drums on the site in an effort to establish dates from the markings on the containers and obtain further samples. These samples were also sent to the Virginia Department of Consolidate Laboratories for analysis.

The investigation by the Virginia State Police was unable to establish:

1. Who placed the drums on the site.
2. When the drums were placed on the site. (We were unable to find containers marked after May, 1980.)
3. The presence of hazardous waste was not established by laboratory tests.

Letters were sent to the owners of the property, who are two minors who do not live in the area. Their aunt came into our offices and discussed the matter with us.

The containers which are not empty contain paint-related materials. The samples analyzed for the State Police indicate paint and varnish makers naphtha, which has been weathered or exposed so that it is not ignitable.

Efforts to trace the source of these materials have centered around an uncle of the deceased owner of the property who lives adjacent to the site. He was employed at one time by the Alcatraze Paint Company which is now owned by Sampson Paint. Current management of Sampson Paint state that they have no knowledge of these materials or how they go to the site.

Drums with markings as having been sent to Miller Manufacturing Company were found on the site. Efforts by the State Police to confirm that the materials came from that facility have been unsuccessful.

Efforts to find witnesses who lived nearby have been fruitless. Mrs. Underwood has stated several times that people have told her that Mr. Lawrence E. Roane placed the drums on the site.

At several points over the last two years there appeared to be new information or leads which might be used to establish conclusively where the containers came from and who was responsible. This information was given to the State Police or the parties having the information have been directed to the State Police.

ART00005

Memorandum to Thomas Modena  
Re: Rustin Property on Rt. 629 in Hanover County  
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Given that we could not establish the presence of Hazardous Waste on the site, an attempt was made to see if the site could be handled by removal to a landfill. Review of the information we do have led to the conclusion that the materials were not well enough identified to dispose of them in a solid waste facility.

The containers are in several piles over the property. Some were within 50 feet of a well which is being used as a source of drinking water. All of the nearby residences use ground water. There are two other residences within 300 feet.

It is apparent that without further information, it will not be possible to establish that these materials are hazardous waste and were brought to the property after the effective date of current legislation.

It is also apparent that the property owners do not have sufficient resources to clean up the property and that the property's value is not in itself sufficient to pay for the clean up.

Please evaluate this site and see if it can be handled under CERCLA.

Enclosures

cc: C. Ronald Smith  
John E. Ely

JAS:001.91/na

AR100006

Notes of Telephone Conversation with  
Special Agent Shomette, VSP

Results of Chemical Analysis of samples taken at Hanover Drum  
Site

Samples Received 9/13/89 by Consolidated Laboratories.

One container of unknown liquid.

To determine if sample contained materials on f list

Liquid with layer of oil floating on top.

Oil was separated from the water layer and analyzed by gc/ms.

This oil is composed of aliphatic hydrocarbons ranging from c8 to  
c17. Also present is a series of materials related to long  
chained aliphatic acids and esters.

The water layer was extracted and analyzed by gc/ms. The results  
of this analysis indicate substances present in the water similar  
to those found in the oil. Some of the F List compounds in both  
the oil and water layer less than 0.1%.

Samples Received 9/26/91 by consolidated laboratory.

Item #1 containing unknown liquid A4  
Item 2 A5  
Item 3 c1  
item 4 c2

analyzed by gc/ms

A4 was extracted. Extract composed of c9-c12 hydrocarbons,  
cyclohexyl hydrocarbons, c2-c4 aromatic hydrocarbons with minor  
amounts of organic esters.

A5 aqueous sample with an oil-like layer on the top. The oil  
layer was composed mainly of c9-c12 hydrocarbons, cyclohexyl  
hydrocarbons, c2-c4 aromatic hydrocarbons and minor amounts of  
organic esters. Also present was phthalate ester.

The aqueous layer of A5 was composed mainly of c9-c12  
hydrocarbons, cyclohexyl hydrocarbons, c2-c4 aromatic  
hydrocarbons and minor amounts of organic esters. Also present  
was a phthalate ester.

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c3 was a thick gelatinous liquid. This sample was composed mainly of c9-c12 hydrocarbons, cyclohexyl hydrocarbons, c2-c3 aromatic hydrocarbons and minor amounts of organic acids and esters.

c4 was extracted and the extract composed mainly of a phthalate ester. also present in the extract were c9-c12 hydrocarbons, cyclohexyl hydrocarbons, c2-c4 hydrocarbons and organic esters.

JAS:002.91/na

AR100008